

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 201~~6~~ covering the prior calendar year 2015

Date filed: February 23, 2016

Name of company covered by this certification: Missouri RSA 5 Partnership

Form 499 Filer ID: 807095

Name of signatory: James A. Simon

Title of signatory: General Manager

I, James A. Simon, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. I acknowledge that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI, and I have no such information to report at this time.

The company has not received any customer complaints in the past year concerning the unauthorized release of or access of CPNI and I hereby acknowledge that if the company does receive any such complaints, it must provide that information to the Commission, including the number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.

Signed   
James A. Simon, General Manager

**Attachments:**            Accompanying Statement explaining CPNI procedures

**Missouri RSA 5 Partnership**  
**STATEMENT OF COMPLIANCE WITH CPNI**  
**47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011**

Missouri RSA 5 Partnership (Missouri RSA) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- Missouri RSA has implemented internal procedures to educate and train employees about CPNI and the disclosure of CPNI. Missouri RSA has established disciplinary procedures for any employee that wrongfully discloses CPNI. We also ensure that our vendors that have access to our customers CPNI are aware of the CPNI rules.
- Missouri RSA does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001-64.2011. Missouri RSA provides either an opt-in notice or an opt-out notice when appropriate and maintains the customer's choice. Therefore, the customer's approval status can be determined prior to use of CPNI.
- Missouri RSA maintains records of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. Also, Missouri RSA maintains records every time third parties are allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used, and what products and services were offered. These records are retained for a period of at least one year.
- Missouri RSA requires sales personnel to obtain supervisor approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- Missouri RSA will provide written notice within five business days to the FCC any instance where the opt-out methods do not work properly, to such a degree that the customer's inability to opt-out is more than an anomaly.